

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE: TENRGYS, LLC, *et al.*,¹
DEBTORS (Jointly Administered)**

**CASE NO. 21-01515-JAW
CHAPTER 11**

AMENDED NOTICE OF DEPOSITIONS BY TENRGYS, LLC ET AL.

PLEASE TAKE NOTICE that, pursuant to Fed. R. Bankr. P. 7026, 7030 and 9014, and Fed. R. Civ. P. 30, beginning at 9 a.m. (Central time) on November 1, 2021, and continuing until adjourned or completed, Tenrgys, LLC, *et al.* (“Tenrgys”) will take the following listed depositions at the locations indicated below, or at such other location(s) to which the parties may mutually agree.

A. Location: The office of US Legal Support, 100 Northeast Third Avenue, Suite 1050, Fort Lauderdale, FL 33301 (Phone: 877.479.2484). The deponents and times at that location are as follows:

1. PanAm19 Holdings, LLC November 1, 2021 at 9 a.m. (Central time).
2. George Bracken November 1, 2021 at 2 p.m. (Central time), or
upon the adjournment or conclusion of the

¹ Jointly administered with *In re Tellus Energy, LLC*, No. 21-01516-JAW; *In re Top Ten Holdings, LLC*, No. 21-01517-JAW; *In re Treetop Midstream Services, LLC*, No. 21-01518-JAW; *In re Acadiana Mineral Owners, LLC*, No. 21-01519-JAW; *In re Antioch Pipeline Company, LLC*, No. 21-01546-JAW; *In re BAX, LLC*, No. 21-01520-JAW; *In re BGGCO, LLC*, No. 21-01537-JAW; *In re BOE, LLC*, No. 21-01521-JAW; *In re BT Lands, LLC*, No. 21-01538-JAW; *In re BXO Lands, LLC*, No. 21-01539-JAW; *In re Cohay Conservation Area, LLC*, No. 21-01540-JAW; *In re Cohay Wildlife, LLC*, No. 21-01541-JAW; *In re Eutaw Ventures, LLC*, No. 21-01522-JAW; *In re Greenleaf CO2 Solutions, LLC*, No. 21-01542-JAW; *In re Highland Colony Capital, LLC*, No. 21-01543-JAW; *In re Jurassic Seismic Company*, No. 21-01549-JAW; *In re LASO, LLC*, No. 21-01523-JAW; *In re Leaf River Land Co., LLC*, No. 21-01544-JAW; *In re NOMS, LLC*, No. 21-01524-JAW; *In re North Cohay, LLC*, 21-01525-JAW; *In re PCE, LLC*, No. 21-01526-JAW; *In re RFND, LLC*, No. 21-01527-JAW; *In re RFS, LLC*, No. 21-01528-JAW; *In re SNPI, LLC*, No. 21-01529-JAW; *In re South Cohay, LLC*, No. 21-01530-JAW; *In re STP Ventures, LLC*, No. 21-01531-JAW; *In re Tallahala Exploration, LLC*, No. 21-01532-JAW; *In re Telpico USA, LLC*, No. 21-01533-JAW; *In re TC Energy, LLC*, No. 21-01534-JAW; *In re TPCO, LLC*, No. 21-01545-JAW; *In re WCOA, LLC*, No. 21-01535-JAW; *In re WYC Lands, LLC*, No. 21-01547-JAW; and *In re Xlake Pipeline Company, LLC*, No. 21-01548-JAW.

preceding deposition, whichever is later.

3. Joe Caporella November 2, 2021 at 9 a.m. (Central time), or upon the adjournment or conclusion of the preceding deposition, whichever is later.

4. Nick Caporella November 2, 2021 at 2 p.m. (Central time), and continuing on November 3, 2021 as needed, or upon the adjournment or conclusion of the preceding deposition, whichever is later.

B. Location: The office of Cumbre Court Reporting, 2019 Galisteo Street, Suite A-1, Santa Fe, New Mexico (Phone: 505.984.2244). The deponent and time at that location is as follows:

1. William J. Waggoner: November 4, 2021 at 10 a.m. (Central time), and continuing on November 5, 2021 as needed.

DEPOSITION OF PANAM19 HOLDINGS, LLC

Pursuant to Fed. R. Bankr. P. 7030 and Rule 30(b)(6) of the Federal Rules of Civil Procedure, the deposition of PanAm19 Holdings, LLC ("PanAm19") will be taken through one or more officers, directors or managing agents, or such other persons as directed by to testify on their behalf, concerning the following matters:

1. The documents, data and information that PanAm19 has been requested to produce and/or has produced in this case.

2. The facts, information and documents about and pertaining to the formation, organization and existence of PanAm19, including its operating agreement, and the identity of the persons who have knowledge of those facts and documents.

3. The facts, information and documents about and pertaining to who have been and who are the owners, members, managers, officers, agents, and representatives of PanAm19, and the identity of the persons who have knowledge of those facts and documents.

4. All discussions, communications, emails, text messages, internet video communications (like Zoom), meetings, agreements and proposed agreements, and business relationships that each of PanAm19, Nick Caporella, Joe Caporella, George Bracken, and Juan Figuereo has had with anyone during the period from December 1, 2018 to date that mention or pertain to the Country of Colombia; or any involvement in, investment in, participation in, or ownership or acquisition of any oil and gas exploration or production prospects, opportunities, assets or activities of any kind in the Country of Colombia; or all or any of the Three Blocks (defined below) or Telpico, LLC; or William Waggoner or Pan American Petroleum Company. “Anyone” means any person, entity or government and includes, but is not limited to the following:

- (1) Pan American Petroleum Company and any of its officers, agents and representatives.
- (2) William J. Waggoner.
- (3) Any person elected or appointed or employed by or for any part of the Government of Colombia.
- (4) Ivan Duque Marquez, President of Colombia.
- (5) Dr. Armando Zamora Reyes, President of the ANH.
- (6) Senator Fernando Araujo Rumie, Country of Colombia.
- (7) Diego Mesa Puyo, Minister of Mines, Country of Colombia.
- (8) Robert Stewart, an attorney in the Country of Colombia.
- (9) James “Bobo” Clarke, of Telpico.

(10) Any capital providers (debt or equity).

(11) Anyone with the “Carlisle Group.”

(12) Any oilfield service provider.

5. The identity, terms, facts and whereabouts of all agreements (written or verbal), contracts (written or verbal), and letters or memos of understanding discussed, offered, proposed or signed between (a) on the one hand, Nick Caporella, Joe Caporella, George Bracken, PanAm19, and/or any agent or representative of PanAm19 and (b) on the other hand, anyone pertaining to any matter or activity or operation in or that would be in the Country of Colombia; and all discussions, meetings and communications about those proposed or signed agreements, matters, activities and operations. “Anyone” includes, but is not limited to, William Waggoner, any officer, employee or representative of Pan American Petroleum Company, and any company or entity that William Waggoner owns, controls or manages in whole or in part.

6. Every occasion on which anyone with or on behalf of PanAm19 has ever had any meetings, discussions or communications, including emails and text messages, that discuss, mention, assess, present, evaluate, value or express any opinion or calculation (draft, tentative or final) of the value or the fair market value, or the potential value or fair market value, of all and any of the Three Blocks, or Telpico, LLC; and the documents, data, files and records that contain that information.

7. When, and from whom PanAm19 has ever requested or received or been presented with any reviews, reserve reports, studies, reviews, evaluations, assessments, valuations, appraisals or opinions pertaining to all or any of the Three Blocks, or Telpico, LLC; the details of the discussions, communications and meetings that occurred about those other such reviews, etc.; and the documents, data, files and records that contain that

information.

8. The knowledge, information, facts, documents, and records that PanAm19 has about the Technical Review (defined below), including who prepared it, when, why, who was provided with the original or a copy, what presentations, discussions, meetings and communications have there been about it with anyone, and what uses anyone has made of it. “Anyone” includes, but is not limited to, PanAm19, William Waggoner, and any officer, employee or representative of Pan American Petroleum Company.

9. Every occasion on which anyone with PanAm19 requested, or was presented with, or obtained, or received, or was shown, or reviewed, or had any discussions, communications or meetings with anyone about the Technical Review, and any other versions or drafts of it. “Anyone” includes, but is not limited to, William Waggoner and any officer, employee or representative of Pan American Petroleum Company.

10. When, and from whom PanAm19 has ever requested or received any studies, reviews, evaluations, assessments, valuations, appraisals or opinions pertaining to all or any of the domestic assets of Tenrgys, LLC et al. (Debtors); the details of the discussions, communications and meetings that occurred about those other such reviews, etc.; and the documents, data, files and records that contain that information.

11. All audio and video recordings and records of the facts, information, discussions, communications and meetings that are covered by matters Nos. 1 through 10 above.

MEANS OF TAKING THE DEPOSITIONS

The depositions will be taken and recorded stenographically and by videotape by and before an officer authorized to administer oaths. Counsel and parties may attend in person or via Zoom (or similar service to be designated). The attorney(s) for Tenrgys, LLC may

participate by Zoom (or similar service to be designated).

DEFINITIONS

To avoid endless repetition, the following terms and phrases are used herein:

1. “PanAm19” means PanAm19 Holdings, LLC and each of its subsidiaries, affiliates, members, managers, officers, directors, employees, agents, servants, representatives, and other persons acting or who have acted for PanAm19 or on its behalf including but not limited to Nick Caporella, Joe Caporella and George Bracken.

2. The “Three Blocks” means those three geographical areas located in the Country of Colombia identified in the Technical Review as the “LLA 42 Block,” the “VSM 22 Block,” and the “VSM 3 Block.” The Three Blocks are sometimes referred to as LLA42, VSM22, and VSM3.

3. The “Technical Review” means and refers to that document entitled “Pan American Petroleum Company Technical Review of Colombian Assets,” a copy of which is Dkt No. 95 filed in this action, which is incorporated by reference.

This the 13th day of October, 2021.

Respectfully submitted,

TENRGYS, LLC et al., Debtors

By: /s/Glenn Gates Taylor
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**ATTORNEYS FOR TENRGYS, LLC, et al.,
Debtors**

CERTIFICATE OF SERVICE

Service provided via Notice of Electronic Filing (NEF) through ECF to all parties signed up to receive such notices, including the following:

Timothy J. Anzenberger	tim.anzenberger@arlaw.com
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This the 13th day of October, 2021.

/s/Glenn Gates Taylor